

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

HANAN FARAJ,

Plaintiff,

DOLLAR TREE STORES, INC.,

Defendant.

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Removed from 15 L 8360

Jury Demanded

NOTICE OF REMOVAL

DOLLAR TREE STORES, INC., the Defendant in the above entitled cause, seeks removal from the Circuit Court of Cook County and to the United States District Court, Northern District of Illinois, Eastern Division and, in support thereof, allege as follows:

1. This action was commenced against DOLLAR TREE STORES, INC., in the Circuit Court of Cook County, Illinois on February 18, 2016. A copy of Plaintiff's First Amended Complaint was received by Defendant DOLLAR TREE STORES, INC. on February 23, 2016.

2. At the time the action was commenced and since then, upon information and belief, the Plaintiff was and is a citizen of the County of Cook, State of Illinois and Defendant, DOLLAR TREE STORES, INC., was and is a corporation organized and existing under the laws of the State of Virginia with its principal place of business in Chesapeake, Virginia.

3. The amount in controversy exceeds \$50,000.00 exclusive of interest and costs, as appears from Plaintiff's First Amended Complaint. (A copy of which is attached hereto and incorporated herein by reference in this Notice as Exhibit "A"). Plaintiff, HANAN FARAJ, allegedly sustained physical, mental and emotional damages as a result of the occurrence including injuries to her left leg, right shoulder and left hand. The damage to Plaintiff's leg and shoulder allegedly require continued medical treatment and allegedly caused permanent damages. Plaintiff's First Amended Complaint seeks damages

in excess of \$50,000.00 for the alleged damages suffered, costs, interests and any other relief allowed by law.

4. This action is a civil one of which the United States District Courts have original jurisdiction under 28 USC §1332.

5. The Defendant DOLLAR TREE STORES, INC. attaches to this notice copies of all process, pleadings, and orders that have been served on it. (A copy of which are attached hereto and incorporated by reference in this Notice as Exhibit "B").

WHEREFORE, the Defendant, DOLLAR TREE STORES, INC., prays that this cause be removed to the United States District Court for the Northern District of Illinois.

BRYCE DOWNEY & LENKOV LLC

DOLLAR TREE STORES, INC.

By: s:/Christopher M. Puckelwartz
One of Defendant's Attorneys

Rich Lenkov, #6231079
Christopher M. Puckelwartz, #6243690
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STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

Christopher M. Puckelwartz, being first duly sworn on oath, deposes and says that:

1. He is one of the attorneys for the Defendant in this cause;
2. He has prepared and read the notice of removal filed in this cause and has personal knowledge of the facts and matters contained in it; and
3. The facts and allegations contained in the notice of removal are true and correct.

BRYCE DOWNEY & LENKOV LLC

DOLLAR TREE STORES, INC.

By: s:/Christopher M. Puckelwartz
One of Defendant's Attorneys

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